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DOC #:
DATE FILED: 3 28 224

March 27, 2024

Via ECF

Hon. Sarah L. Cave United States Magistrate Judge Southern District of New York 500 Pearl St. New York, NY 10007-1312

OK

Re: Vega v. The City of New York et al., 23-cv-05645

Dear Judge Cave:

We represent the Plaintiff in the above-captioned action and write to respectfully request a 30-day extension to the deadline to move for an amendment of the pleadings. The current deadline is Friday, March 29, 2024, and therefore, Plaintiff requests an extension to Monday. April 29, 2024. This is Plaintiff's second request for an extension on the deadline to move for amendment.

On March 6, 2024, the Defendant City and Defendant Boodoo served written responses to Plaintiff's First Set of Interrogatories and Request for Production of Documents, which identified the full names of the remaining Doe Defendants.

The parties are currently scheduled for a settlement conference with Your Honor on Thursday. April 11, 2024. As adding new parties would require additional work, making representation decisions, and cause unnecessary delay mediation. Plaintiffs would like to try and resolve all claims, which would include waiver against any unnamed officers, before adding them to the suit.

As such, Plaintiff respectfully requests a 30-day extension to move for an amendment of the pleadings. Plaintiff has spoken with counsel for the Defendant City and Defendants Boodoo and Hehl, who have indicated their consent to the extension.

Finally, the instant request for an extension should not affect any other scheduled dates.

We thank the Court for considering our request.

Respectfully,

/s/

Sara Wolkensdorfer